



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PERMIT TO OPERATE A
CONNECTICUT HAZARDOUS WASTE FACILITY

Pursuant to Chapters 439 and 446K of the Connecticut General Statutes, a permit is issued to:

Permittee:

Pratt & Whitney, a Division of
United Technologies Corporation
1 Financial Plaza
Hartford, Connecticut 06101

Facility Identification:

Permit No. DEP/HWM-043-061
EPA ID No. CTD990672081

To operate a Hazardous Waste Storage facility located at 400 Main Street, East Hartford, Connecticut, in accordance with Sections 22a-6 and 22a-449(c) of the Connecticut General Statutes ("CGS") as specified in the conditions and attachments set forth herein.

This permit regulates and authorizes the storage of hazardous wastes, non-hazardous wastes, universal wastes and used oil generated from the design, manufacture, assembly, and testing of aircraft jet engines components, and the storage and management of wastes from other United Technologies Company ("UTC") offsite locations. The facility shall be operated by the Permittee.

All terms used in this permit are as defined in this permit or if not defined in the permit are as defined in Section 22a-449(c)-100 of the Regulations of Connecticut State Agencies ("RCSA") or as defined in Title 40 of the Code of Federal Regulations ("CFR") Parts 260 through 264, 268, 270, 273, 279 and 124. Nothing in this permit shall preclude the Commissioner from reviewing and modifying the permit at any time during its term in accordance with 40 CFR 270.41, as modified by 22a-449(c)-110(a)(2).

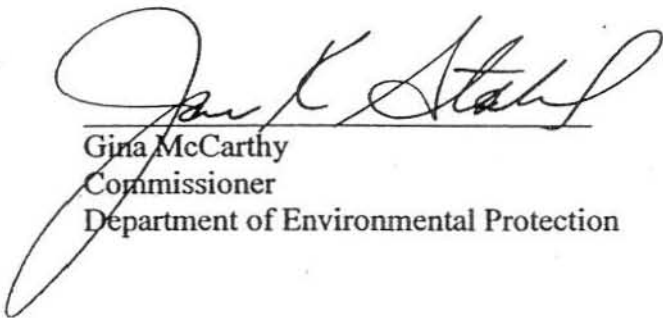
This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with 40 CFR 270.41, 270.42 and 270.43, as modified by 22a-449(c)-110(a)(2), and potential enforcement action. The Permittee shall keep records of all the information used to complete the permit application, and any supplemental information submitted in connection with the permit application, for the effective term of this permit. The permit application is hereby incorporated by reference as part of this permit. The Permittee shall inform the Commissioner of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

The Permittee shall comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) in Section I, Standard Facility Conditions; Section II, Permitted Activities; Section III, Operating Conditions; Section IV, General Facility Conditions; and Section V, Compliance Schedule, and the information as specified in the Permittee's permit application, except where the application is superseded by the more stringent conditions contained herein. Any violation of any provision of this permit may subject the Permittee to enforcement action pursuant to the CGS including but not be limited to Sections 22a-6a and 22a-131.

This permit may be revoked, suspended, modified, transferred, or reissued, in order to comply with the applicable law. The Commissioner may also modify this permit when the Commissioner's deems it necessary to do so. The Permittee shall submit a revised permit application to the Commissioner at least one hundred eighty (180) calendar days before making any changes to any of the permitted areas or activities. Any revised application shall be approved in writing by the Commissioner prior to the Permittee implementing such changes.

This permit is effective September 29, 2005 and shall remain in effect for ten (10) years until September 29, 2015 unless revoked and reissued, or terminated under 40 CFR 270.41 and 270.43, as modified by 22a-449(c)-110(a)(2).

September 29, 2005
Date


Gina McCarthy
Commissioner
Department of Environmental Protection



STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION



FACT SHEET RCRA PART B PERMIT

- (A) **FACILITY:** Pratt and Whitney, a Division of
United Technologies Corporation
400 Main Street
East Hartford, Connecticut 06108
- (B) **FACILITY TYPE.** Pratt and Whitney (hereinafter "the Permittee" or "P&W"), a United Technology Company ("UTC"), is engaged in the business of design, development, testing and manufacturing of aircraft engines and components. P&W seeks authorization to continue the storage (including those activities incidental to waste storage: receiving, shipping, bulking, repacking, commingling, compacting, rinsing of containers and tanks, sampling and testing), and management of wastes identified as (1) listed and exhibits the characteristics of hazardous wastes under the Resource Conservation and Recovery Act ("RCRA") in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-104; (2) Universal Wastes in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-113; (3) Used Oil in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-119; and (4) Non-RCRA wastes under Connecticut General Statute Section 22a-448. P&W accepts wastes for storage and management from other UTC offsite locations.
- (C) **MANAGEMENT UNITS** (Centralized Waste Storage and Transfer facility (CWS&TF))
- (1) Container Storage Area. The maximum volumetric capacity of the CWS&TF shall not exceed 59,400 gallons of RCRA waste and 240 cubic yards of Non-RCRA wastes in roll-offs (equivalent to six (6) roll-offs). The methods used to transfer containers include fork trucks, hand trucks, tricycle carts, hand-carried safety cans, carts, dollies and motorized carts. The typical container sizes are 15 gallon (plastic), 20 gallon fiber drum, 55 gallon, 330 and 305 gallon portable tanks and 20, 25, 30 and 40 cubic yards roll-offs.
 - (2) Roll-Off Containers. Roll-offs will be utilized for the accumulation of contaminated media, construction debris, spent filters, scrap metals, unwanted wood and any other material that is not prohibited by this permit. No free draining liquids will be allowed in roll-offs. The roll-offs are stored in Truck Pads Number 1, 2, 3 and 4 (two roll-offs per truck pad). The maximum number of roll-offs in the CWS&TF is six (6). The roll-off storage areas may have a combination of RCRA and Non-RCRA wastes. However, Non-RCRA roll-offs shall not exceed 240 cubic yards or the equivalent to six (6) roll-offs.
 - (3) Staging Areas. There are four (4) staging areas with secondary containment for the sole purpose of storing compatible containers for a maximum period of seventy-two hours while in transition to either the container storage area or

solutions, other metal finishing wastes, and multi source leachate). The waste codes are the following:

F001, F002, F003, F004, F005, F006, F007, F008, F009

- (c) U-Wastes: Toxic hazardous wastes, which are commercial chemical products, including discarded products, off-specification products, container residues and spill residues. The waste codes are the following:

U002, U019, U021, U031, U032, U044, U052, U055, U056, U077, U080, U108, U112, U117, U121, U122, U133, U134, U138, U140, U144, U151, U154, U159, U161, U165, U188, U201, U210, U211, U220, U223, U226, U228, U239

- (d) P-Wastes: Acutely hazardous waste of specific commercial chemical products including discarded products, off-specification products, container residues and spill residues. The waste codes are the following:

P029, P030, P098, P104, P105, P106

- (2) The storage of universal wastes in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-113. These wastes are:

- (i) Batteries
- (ii) Thermostats
- (iii) Lamps
- (iv) Used Electronics
- (v) Pesticides

- (3) The storage of Used Oil in accordance with Connecticut's Hazardous Waste Management Regulations, Section 22a-449(c)-119.

- (4) Non-RCRA Wastes under the CGS, Section 22a-448. The following 22a-448 waste types are authorized for storage and management pursuant to this permit:

- (a) Waste PCBs (CR01). Any waste material containing or contaminate by PCBs (Polychlorinated Biphenyls) in concentrations of less than 50 ppm (parts per million). These include, but are not limited to, PCB oils, items and equipment.
- (b) Waste Oil (CR02). Any oil or petroleum that is no longer suitable for the services for which it was manufactured due to the presence of impurities or loss of original properties and is not miscible in water. These include, but are not limited to, crude oil, fuel oil, lubricating oil, kerosene, diesel fuel, motor oil, non-halogenated oil, and oils that are recovered from oil separators, oil spills or tank bottoms.

of hazard for specific chemicals specified in this Section II (B) (1)(f) shall be found in NFPA 325 M and NFPA 49 or the equivalent in the HMIS system.

- (i) Shock sensitive materials, defined as materials that are readily capable of detonation or explosive decomposition or reaction at normal temperatures and pressures. And sensitive materials to mechanical or localized thermal shock at normal temperatures and pressures, including materials designated by the National Fire Protection Association (NFPA) 704 as having a Reactivity Hazard Rating of 4 (See NFPA 704, 1990 or latest edition).
- (j) Special Hazards: The limits identified below are maximum storage quantities of the combined total of both liquids and solids wastes present at the Permittee's waste storage management unit(s). These limitations apply per area.

(i) Liquid and Solid Oxidizing Materials, as defined in MFPA 43A;

(1) Class 1 and 2 oxidizers, except as provided for herein:

- (a) Staging of oxidizers shall be allowed in Staging Area 211.
- (b) Container Storage Areas 327 and 328 shall be allowed to store Class 1 and Class 2 oxidizers up to a maximum of 2,200 gallons per Area not to exceed 4,000 gallons. Storage Areas 330 and 331 may be utilized to store oxidizers if the Permittee complies with the implementations procedures at that time of changing the waste type in a container storage area. Oxidizers shall not exceed 8,000 gallons at any one time in the CWS&TF.
- (c) Tank storage of oxidizers is restricted to Tank 101 and with a maximum storage capacity of 40,000 pounds (4,000 gallons). In cases where Tank 101 has been taken out-of-service for reasons documented in the Operating Record, P&W is allowed to use Tank 102 as necessary, in accordance with prohibitions set forth here and in Section III. Acid mixtures (excluding oxidizer and incompatible wastes) may be stored in Tank 102. At no time shall Tanks 101 and 102 be utilized concurrently for the storage of Class 1 and 2 oxidizers;

- (2) Class 3 oxidizers in excess of 200 pounds; and
- (3) Class 4 oxidizers in excess of 10 pounds.

(ii) Organic Peroxide Formulations, as defined in NFPA 43B;
Class I Organic Peroxides, are prohibited
Class II Organic Peroxides, are prohibited
Class III Organic Peroxides in excess of 1,500 pounds, and
Class IV Organic Peroxides in excess of 100,000 pounds.

CONNECTICUT HAZARDOUS WASTE PERMIT

**TO OPERATE A
PART B PERMIT FOR A HAZARDOUS WASTE STORAGE FACILITY UNDER
THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)**

**PRATT & WHITNEY
A DIVISION OF UNITED TECHNOLOGIES CORP**

**PERMIT No. DEP/HWM-043-061
EPA ID No. CTD990672081**

**PERMIT ISSUED – SEPTEMBER 29, 2005
PERMIT EXPIRES – SEPTEMBER 29, 2015**

**PRATT & WHITNEY
400 MAIN STREET
EAST HARTFORD, CONNECTICUT 06108**

TABLE OF CONTENTS

SECTIONS	TITLE
Section I	STANDARD FACILITY CONDITIONS
Section II	PERMITTED ACTIVITIES
	A. Waste Management Units
	(1) Container Storage Areas
	(2) Roll-Off Containers (RCRA and Non-RCRA)
	(3) Staging Areas
	(4) Truck Pads with Loading/Unloading Areas
	(5) Satellite Accumulation Areas (Containers)
	(6) Tank Storage Management Areas
	(7) Compactor Unit
	B. Chemical Management
	(1) Specific Prohibitions
	(2) Permitted Wastes
	(3) Permitted Waste Management
Section III	OPERATING CONDITIONS
	A. Operating Conditions Applicable to All Permitted Activities
	B. Container Operating Conditions
	C. Staging, Truck Pads and Loading/Unloading Area(s)
	D. Tank Systems Operating Conditions
	E. Compactor Unit Operating Conditions
Section IV	GENERAL CONDITIONS
	A. Imminent Hazard Actions
	B. Required Transfer Notice
	C. Waste Analysis
	D. Security
	E. General Inspection Requirements
	F. Personnel Training
	G. General Requirements for Ignitable, Reactive or Incompatible Waste
	H. Preparedness and Prevention
	I. Contingency Plan
	J. Manifest System
	K. Operating Records
	L. Availability, Retention and Disposition of Records
	M. Biennial Report
	N. Corrective Action
	O. Closure
	P. Financial Responsibility
	Q. Air Emission Requirements, Subpart BB
	R. Air Emission Requirements, Subpart CC
	S. Universal Wastes
	T. Used Oil
	U. Applicable Laws
	V. Location Standards
Section V	COMPLIANCE SCHEDULE

TABLE OF CONTENTS (Continued)**Figures****Title**

Figure II-1 Centralized Waste Storage and Transfer Facility (CWS&TF)

Attachments**Title**

- A. Waste Analysis Plan
- B. Contingency Plan
- C. Closure Plan
- D. Personnel Training Program
- E. Inspection Plan

Tables**Title**

Table II-1	Container Storage Areas
Table II-2	Container Staging Areas
Table II-3	Tank Storage Management Areas
Table II-4	Typical Compactor Wastes
Table III-1	Cleaning Solutions for the Container Storage and Container Staging Areas
Table III-2	Cleaning Solutions for Tank Systems or Tank Storage Areas
Table III-3	Summary of Tank Systems Subject to Subpart BB, Equipment Leaks
Table III-4	Typical Compactor Wastes
Table WAP-1	Waste Characterization
Table WAP-2	Sampling Equipment
Table WAP-3	Examples of Sample Collection and Analytical Techniques: Containerization Preservation and Holding Times
Table WAP-4	Waste Verification (Evaluation/Spot Tests)

SECTION V

Compliance Schedule
RCRA Part B Permit
Pratt & Whitney
400 Main Street
East Hartford, CT 06108

SECTION V COMPLIANCE SCHEDULE

All documentation that is submitted pursuant to conditions of Section V of this Compliance Schedule shall be approved in writing by the Commissioner.

- (1) Compactor Unit. On or before forty five (45) days after issuance of this permit, the Permittee shall submit for review and written approval by the Commissioner a description of the operating procedures for the compactor unit.
 - (a) Standard Operating Procedures for the compactor unit shall include but not be limited to:
 - (i) Description of the types of waste streams;
 - (ii) The estimated quantity managed by the compactor unit for each waste stream;
 - (iii) Treatment practices (volume reduction);
 - (iv) Handling and disposal practices;
 - (v) Procedures to be implemented to prevent any off-site hazardous waste from entering the compactor unit; and
 - (vi) A plan to either monitor any organic emissions during the operation or eliminate or prevent any waste that may contain any significant concentrations of volatile organics from entering this waste stream that would trigger the RCRA air organic 500 ppmv threshold.
- (2) Inspection Schedule and Log. On or before sixty (60) days after issuance of this permit, the Permittee shall submit for review and written approval by the Commissioner an updated Inspection Schedule and Log specific to the permitted facility. At a minimum, the inspection plan shall include:
 - (a) Subparts BB and CC (RCRA organics) inspection requirements (i.e., valves, leaks).
 - (b) Tank inspections shall include measures to take if there is any change in tank storage usage.
 - (c) The inspection of the roll-offs shall be incorporated in the container storage inspection schedule and log.
 - (d) The inspection of the compactor unit shall be incorporated in the inspection schedule and log.

(3) Contingency Plan

- (a) On or before ninety (90) days after issuance of this permit, the Permittee shall submit for review and written approval by the Commissioner a revised Contingency Plan. Such a revised plan shall include, at a minimum:
 - (i) A detailed evacuation map for the hazardous waste management areas (CWS&TF) demonstrating primary and secondary evacuation routes and a muster area for such evacuation.
 - (ii) A description of the notification procedures to comply in the event that the abutting properties need to be evacuated in an emergency.
 - (iii) The emergency response equipment location drawing needs to specify the quantities of emergency equipment at each location. The locations of the fire protection and emergency response equipment shall be noted in Drawing 8-1. The inspection checklist shall note the quantity of equipment stored at each location.
- (b) Within sixty (60) days of the Commissioner's written approval, the Permittee shall send by certified mail or electronic mail with a request for a return receipt or a reply confirmation, the approved Contingency Plan to the police, fire department, hospital and emergency response teams in the vicinity of the facility.

(4) Personnel Training. On or before one hundred twenty (120) days after issuance of this permit, the Permittee shall submit for review and approval an up-to-date Personnel Training Plan to incorporate any changes that have occurred since the March 2000 submittal of the permit application. The revised Personnel Training Plan at a minimum shall include the following:

- (a) Training requirements and a revised training module for those activities or equipment subject to Subparts BB and CC (RCRA organics) and a description on how the facility will achieve compliance with respect to such requirements.
- (b) A revised training module summary chart reflecting the hierarchy of the personnel in charge of the hazardous waste activities (i.e., emergency coordinator, supervisor, waste handlers, etc.) and their required training.
- (c) Detailed training modules need to be revised to include roles and responsibilities associated with each training position. The training modules shall be revised to include the roles and responsibilities of personnel that are involved with hazardous waste activities.

- (5) Closure Plan. On or before one hundred eighty (180) days after issuance of this permit, the Permittee shall submit for review and written approval a revised Closure Plan to incorporate the following:
- (a) A description of the dismantling, decontamination and confirmation sampling along with analytical procedures for the compactor unit and roll-offs storage. (Documentation of the closure and subsequent disposition of the unit shall be submitted to the Commissioner with the certification of closure).
 - (b) Page 3-6 item 3.5(a) of the closure plan shall be revised to include, regardless of the finding(s) in the concrete, the sampling and analysis of the subsoil beneath the concrete. The subsoil will be tested for Appendix IX constituents to determine whether any hazardous constituents have been released to the environment and will help to eliminate any uncertainty of contamination.
 - (c) The procedures that will be implemented at the time of disposal of wastes generated during an incident. Such procedures shall comply with the requirements of this permit waste analysis plan and contingency plan emergency response contractors.
 - (d) The closure cost estimates shall be revised to incorporate the costs associated with the wipe sampling testing during the closure process and the closure of the compactor unit and roll-offs.
 - (e) The corporate guarantee shall reflect any changes in the estimated closure cost for subsequent years. An updated corporate guarantee shall be submitted reflecting the revised closure costs associated with this permit. Any changes in the closure cost estimate shall be reflected in future financial assurance documents. The Commissioner shall be notified in writing if there are any significant changes in the closure cost estimates.
- (6) Corrective Action
- (a) On or before one hundred and eighty (180) days after issuance of this permit, the Permittee shall submit, following the process described in RCRA 22a-449(c)-105h, an Environmental Condition Assessment Form summarizing the environmental investigations and remediation conducted at the facility to date and shall include a list of all known releases of hazardous wastes or hazardous substances at or from the facility. Upon review of the Environmental Condition Assessment Form the Commissioner will notify the Permittee in writing whether any further investigation and remediation is required and that either: (1) the remaining investigation and remediation will be reviewed and approved in writing by the Commissioner; or (2) an environmental professional licensed pursuant to Section 22a-133v of the Connecticut General Statutes ("a licensed environmental

professional”), may verify that all known releases of hazardous waste or hazardous substance at the facility have been investigated and remediated in accordance with the Remediation Standard Regulations [RCSA Section 22a-133k-1 through 3]. If the Commissioner notifies the Permittee that such investigation and remediation may be overseen by a licensed environmental professional then the Commissioner shall review the Remedial Action Plan submitted by the licensed environmental professional prior to its implementation. At the time of such review, or at any other time, the Commissioner may notify the Permittee that the Commissioner’s review and written approval of any investigation or remedial action is necessary. Additionally, the Commissioner shall review the verification to determine if remediation is complete.

- (b) Corrective Action Schedule. On or before thirty (30) days of receipt of the notice from the Commissioner indicating whether the Commissioner or a Licensed Environmental Professional will oversee the investigation and remediation, the Permittee shall submit to the Commissioner a “corrective action schedule” for investigating and remediating releases of hazardous waste and hazardous substances at or from the facility. The corrective action schedule must include and/or provide for the following:

- (i) A public participation plan that provides:

- (1) Public participation prior to initiation of remediation, including at a minimum ensuring public notice, using the procedures described in RCSA Section 22a-449(c)-105(h)(7); and
- (2) Public participation prior to a final determination that remediation is complete including at a minimum ensuring public notice. Such public notice shall be published, at the Permittee’s expense, in a newspaper having a substantial circulation in the affected area; and be provided to all persons on the facility mailing list maintained pursuant to 40 CFR 124.10(c)(1)(ix); and indicate the basis for the Commissioner’s determination that remediation is complete and that the Commissioner will accept public comments on the tentative determination that remediation is complete for at least thirty (30) days from the date of publication.
- (3) Response to Public Comments. If comments are received during any public comment period, whether received directly by the Permittee or if forwarded from the Commissioner, then the Permittee shall, within sixty (60) days of receiving such comments, submit to the Commissioner a written summary of all such comments and a written response to each such comment. The Commissioner shall review such summary and responses and shall adopt it as the Commissioner’s own, adopt it with modifications, or

reject it and prepare a response to each such comment. The Permittee shall send a copy of the initial summary and responses to each person who submitted comments.

- (ii) An ecological risk assessment ("ERA") to evaluate the potential for ecological receptors to be exposed to contaminants and to ensure that remedial goals and objectives address protection for those receptors from existing or potential contaminant exposures.
 - (iii) A Quality Assurance Project Plan ("QAPP"), prepared in accordance with the document titled: Quality Assurance Guidance for Conducting Brownfields Site Assessments, US Environmental Protection Agency OSWER Directive No. 9230.0-83P or its equivalent or replacement as directed by the Commissioner. The Permittee shall ensure that the data is of sufficient quality to make decisions regarding the investigation and remediation of the site.
- (c) Lead Criterion for Soil. The Permittee shall use 400 mg/kg of lead in soil as the cleanup standard for the residential direct exposure criterion for soil, as authorized by RCRA Section 22a-133k-2(i) or as modified by the Commissioner at the time of plan implementation.